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UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF NEW YORK

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In re:	:	
	:	Chapter 11
MEMORY LANE MUSIC GROUP LLC, <i>et al</i> ,	:	Case No. 22-70838-AST
	:	
Debtors.	:	Jointly Administered
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**DEBTOR’S OBJECTIONS AND RESPONSES TO *BUNCH*
 CREDITORS’ FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Rules 7026 and 7034 of the Federal Rules of Bankruptcy Procedure, Memory Lane Music Group LLC, Scion Three Music LLC, Scion Four Music LLC and Larry Spier Music LLC (collectively, “Debtors”) respond to the *Bunch Creditors’ First Requests for Production of Documents to Debtors Regarding Debtors’ Joint Subchapter V Plan of Reorganization* (the “Requests”).

GENERAL OBJECTIONS AND CONDITION TO RESPONSE

1. The Debtors object to the Requests to the extent they seek or purport to seek information that is protected by the attorney-client privilege, the work product doctrine or any other applicable privileges, laws or rules. The Debtors do not waive the attorney-client privilege, the work product privilege or any other lawfully recognized privilege or immunity from disclosure that may be applicable to the information requested. The Debtors will only produce responsive non-privileged documents.

2. The documents provided are “Confidential” and subject to the *Order for the Production and Exchange of Confidential Information* entered by the New York Supreme Court in *Bunch, et al. v. Memory Lane Music Group, et al.*, Index No. 654117/2019, applicable in this case.

3. The Debtors object to any form of production of electronically stored information that imposes any differing or additional obligations from those imposed by applicable rules. The Debtors further object to the extent the *Bunch* creditors seek electronically stored information that is not reasonably accessible by the Debtors because of undue burden or cost.

4. This response is subject to, and without in any way waiving or intending to waive, all questions or objections as to competency, relevancy, materiality, privilege and admissibility as evidence, or for any other purpose, of any of the documents produced or the subject matter thereof in the trial of this dispute or any other action or proceeding.

5. These general objections and conditions apply to all Requests and are incorporated by reference into each response. All documents that the Debtors produce are also subject to any specific objections noted below

SPECIFIC OBJECTIONS AND RESPONSES

Request No. 1

All Administration Agreements.

Response to Request No. 1

The Debtors object to this request as overbroad and burdensome. Subject to the objection, the Debtors are producing a summary chart that identifies the publisher, contracting party, and rate paid to the client. See documents at

<https://www.dropbox.com/sh/u5a2z1rh0akda0i/AAA5U2CnMTG-Z3rqC30P6YYSa?dl=0>

Request No. 2

All Valuation(s) of the Administration Agreements.

Response to Request No. 2

None.

Request No. 3

All contracts between any of the Debtors and Atlas Music Corp. or Downtown Music Corp. (including any subsidiary or related entity such as, but not limited to, Downtown DLJ Songs).

Response to Request No. 3

See documents at

<https://www.dropbox.com/sh/u5a2z1rh0akda0i/AAA5U2CnMTG-Z3rqC30P6YYSa?dl=0>

Request No. 4

All Documents demonstrating that the musical works or song titles that Memory Lane owns or claims to own are “worth approximately \$300,000 after selling costs.”

Response to Request No. 4

See documents at

<https://www.dropbox.com/sh/u5a2z1rh0akda0i/AAA5U2CnMTG-Z3rqC30P6YYSa?dl=0>

Request No. 5

All Valuation(s) of the musical works or song titles that any of the Debtors owns or claims to own.

Response to Request No. 5

See Response to Request No. 4.

Request No. 6

All Documents relating to the “Debtors estimate Allowed Professional Fee Claims to be \$90,000 (inclusive of the Subchapter V Trustee’s fees).”

Response to Request No. 6

The Debtors object to this Request. The estimate of Allowed Professional Fee Claims in the Plan is aggregate, which is all that the Debtors are required to disclose. The

amount of each individual professional's allowed claim is irrelevant to whether the Debtors will be able to demonstrate at the confirmation hearing that they will be able to satisfy the claims. The Debtors will produce copies of their professionals' time records in connection with final fee applications in the case.

Request No. 7

All agreements between Capital One and any of the Debtors.

Response to Request No. 7

The Capital One claim is being reclassified in the amended plan as unsecured.

The Debtors object to this Request as irrelevant.

Request No. 8

All Documents relating to the advice by counsel that the claims against the non-debtor defendants "cannot proceed in state court independent of the claim against the Debtor" as stated in the Declaration.

Response to Request No. 8

The Debtors object to this Request because on its face it asks for Documents that are protected by the attorney-client privilege. This is an improper Request that should not have been asked.

Dated: New York, New York
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By:



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